

STATE OF CALIFORNIA
STATE AND CONSUMER SERVICES AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
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Office Use Item No. _____

PARTICIPATION COMMENTS FOR THE NOTICE DATED MARCH 18, 2008
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: MAY 12, 2008

Date: 5-12-2008

From: Shulamit Rabinovich, PE
Name (Print or type)

Ted Jacob Engineering Group
Agency, jurisdiction, chapter, company, association, individual, etc.

1763 Broadway Oakland CA 94612
Street City State Zip

I/We ☐ (do) ☒ (do not) agree with:

The Agency proposed modifications As Submitted on Section No. 315.1.2 Exception (2) 2007 CMC
and request that this section or reference provision be recommended:

☐ Approved ☒ Disapproved ☐ Held for Further Study ☐ Approved as Amended

to the proposing state agency.

Suggested Revisions to the Text of the Regulations:

Do not delete the words "controlled by the same thermostat"

Reason: [The reason should be concise. If the request is for "Disapproval," "Further Study," or "Approve As Amend", identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

The public interest requires that the regulation for the design is technically sound and may be implemented.
This is a public (patient and medical staff) health issue as well.

The words "controlled by the same thermostat" were specifically added to this section in past CMC upgrade to facilitate proper design.

CMC Table 315 specifies temperature ranges as well as related humidity ranges.

It is impossible to control the same relative humidity level with one humidifier serving several rooms in which the temperature is controlled by different thermostats when each thermostat is set to a different temperature.

In practice each sensitive area is supplied by a separate terminal unit with reheat coil with humidifier installed downstream from the reheat coil to introduce moisture into heated airstream.

Only hot air may absorb moisture, therefore injection of moisture should be done on an individual basis for each room and each terminal unit.

Since sensitive rooms (even with the same exposure) have individual temperature requirements and dedicated thermostats, the same goes for the humidifiers and humidistats.

The notion of supplying several sensitive rooms from a single terminal unit is erroneous since the ability to maintain desired temperature in each room is unattainable.

Please note that humidifier should not be installed upstream of the terminal unit(s) since air at low temperature will not absorb moisture.

Not only proper humidification will not be achieved, but also there will be condensation in the ductwork, terminal units and HEPA filter, if used.

The proposed change will lead to the technically incorrect approach that will lead to health concerns.

If the proposed change is accepted then the requirement to achieve proper relative location of the humidifier and terminal box with reheat coil becomes unenforceable.

HEALTH & SAFETY CODE SECTION 18930

SECTION 18930. APPROVAL OR ADOPTION OF BUILDING STANDARDS; ANALYSIS AND CRITERIA; REVIEW CONSIDERATIONS; FACTUAL DETERMINATIONS

- (a) Any building standard adopted or proposed by state agencies shall be submitted to, and approved or adopted by, the California Building Standards Commission prior to codification. Prior to submission to the commission, building standards shall be adopted in compliance with the procedures specified in Article 5 (commencing with Section 11346) of Chapter 3.5 of Part 1 of Division 3 of Title 2 of the Government Code. Building standards adopted by state agencies and submitted to the commission for approval shall be accompanied by an analysis written by the adopting agency or state agency that proposes the building standards which shall, to the satisfaction of the commission, justify the approval thereof in terms of the following criteria:
- (1) The proposed building standards do not conflict with, overlap, or duplicate other building standards.
 - (2) The proposed building standard is within the parameters established by enabling legislation and is not expressly within the exclusive jurisdiction of another agency.
 - (3) The public interest requires the adoption of the building standards.
 - (4) The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.
 - (5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.
 - (6) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.
 - (7) The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.
 - (A) If a national specification, published standard, or model code does not adequately address the goals of the state agency, a statement defining the inadequacy shall accompany the proposed building standard when submitted to the commission.
 - (B) If there is no national specification, published standard, or model code that is relevant to the proposed building standard, the state agency shall prepare a statement informing the commission and submit that statement with the proposed building standard.
 - (8) The format of the proposed building standards is consistent with that adopted by the commission.
 - (9) The proposed building standard, if it promotes fire and panic safety as determined by the State Fire Marshal, has the written approval of the State Fire Marshal.